

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA

Plaintiff,

HON. ROBERT H. CLELAND

VS.

CASE #: 11-20129

SCOTT WILLIAM SUTHERLAND, ET. AL.

Defendants.

\_\_\_\_\_ /

UNITED STATES OF AMERICA,

Plaintiff,

CASE #: 11-20066

VS.

JEFF GARVIN SMITH, ET. AL.

Defendants.

\_\_\_\_\_ /

UNITED STATES OF AMERICA,

Plaintiff,

CASE #: 12-20387

VS.

SMILEY VILLA, ET. AL.

Defendants

\_\_\_\_\_ /

**GROUP 4 REACTION TO THE GOVERNMENT'S  
MEMORANDUM OF CASE MANAGEMENT (DE 470)**

As ordered by the Court in its Preliminary Scheduling Order (DE 462), liaison counsel for the Group 4 defendants, William W. Swor, hereby submits their reactions to the Government's Memorandum of Case Management (DE 470).

Group 4 Defendants generally adopt the Responses filed on behalf of Groups 2 & 3 (DE 471, 472).

Group 4 defendants supplement their adoption with the following observations:

**6a) Discovery:** While Group 4 generally agrees the resolution of the motions for protective orders must be resolved prior to the dissemination of discovery, they believe that all defendants

should be given their own statements, if any, immediately.

**6b) Format and Cost of Discovery:** In addition to the issues already raised by the other groups, Group 4 urge the Court to order that the government provide the discovery material in a Bates stamped manner that is consistent and usable, e.g. in some cases in which counsel has recently participated, the government has Bates stamped documents "Sutherland001, Sutherland002", etc. with each page being a separate document, or a separate subject. In such cases, while the items are OCR'd and searchable, the search function useless unless the reader knows in advance which document or group holds the topic or item the reader is looking for.

Respectfully submitted,

/s William W. Swor

William W. Swor (P21215)

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*Acting on behalf of Group 4 Defendants*

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